

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CITY OF WESTLAND POLICE AND FIRE : Civil Action No. 1:18-cv-08049-RA
RETIREMENT SYSTEM, Individually and on :
Behalf of All Others Similarly Situated, : CLASS ACTION

Plaintiff, :

vs. :

PHILIP MORRIS INTERNATIONAL INC., :
ANDRÉ CALANTZOPOULOS, MARTIN G. :
KING and JACEK OLCZAK, :

Defendants. :

WAYNE GILCHRIST Individually and on : Civil Action No. 1:18-CV-09856-RA
Behalf of All Others Similarly Situated, :
:

Plaintiff, :

vs. :

PHILIP MORRIS INTERNATIONAL INC., :
ANDRÉ CALANTZOPOULOS, MARTIN G. :
KING and JACEK OLCZAK, :

Defendants. :

x

TEAMSTERS LOCAL 710 PENSION FUND'S NOTICE OF MOTION FOR
CONSOLIDATION OF RELATED ACTIONS, APPOINTMENT AS LEAD PLAINTIFF, AND
APPROVAL OF SELECTION OF COUNSEL

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

PLEASE TAKE NOTICE that class member and proposed lead plaintiff Teamsters Local 710 Pension Fund (the “Pension Fund”), will move this Court, on a date and at such time as may be designated by the Court, in Courtroom 1506 of the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, NY 10007, for an order: (1) consolidating *City of Westland Police and Fire Retirement System v. Philip Morris International Inc., et al.*, No. 1:18-cv-08049-RA and *Gilchrist v. Philip Morris International Inc., et al.*, No. 1:18-cv-09856-RA; (2) appointing the Pension Fund as lead plaintiff pursuant to the Private Securities Litigation Reform Act of 1995 (“PSLRA”), 15 U.S.C. §78u-4, *et seq.*; and (3) approving the Pension Fund’s selection of Robbins Geller Rudman & Dowd LLP as lead counsel for the proposed class. In support of this Motion, the Pension Fund submits the accompanying Memorandum of Law, the Declaration of David A. Rosenfeld, and a [Proposed] Order.

DATED: November 5, 2018

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DOWD LLP
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DAVID A. ROSENFELD
VINCENT M. SERRA
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/s/ *David A. Rosenfeld*
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[Proposed] Lead Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on November 5, 2018, I caused to be served the Notice of Appearance upon all counsel of record through filing of these materials with the Court's Case Management and Electronic Case Filing System.

/s/ David A. Rosenfeld

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